

### REMARKS

There are now pending in this application claims 1-7 and 10-16, of which claims 1 and 10 are independent. Claims 8 and 9 have been cancelled without prejudice or waiver of their subject matter. No claims have been added.

In view of the above amendments and the following remarks, favorable reconsideration and allowance of the above application is respectfully sought.

Independent claim 1 as amended is directed to an excitation coil unit for use in an image heating apparatus. The unit comprises a coil formed of a conductor whose conductive portions not covered with an insulating tube are removed and a heat resistant insulating material which is inserted between the conductive portions of the conductor forming the coil and covers a substantial portion of the coil. The invention is further characterized in that the heat-resistant insulating material contacts the conductive portions of the coil.

Independent claim 10 is directed to an image heating apparatus which comprises a conductive rotatable member and an excitation coil which incorporates at least the above salient features of the excitation coil defined in claim 1.

Each of claims 1-7 and 10-16 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Nagahira (U.S. Patent No. 6,605,802). In view of the above amendments, the rejections are respectfully traversed.

Applicant's invention as now recited in each of the independent claims of the above application is characterized by inclusion of a coil formed of a conductor whose conductive portions not covered with an insulating tube are removed and a heat resistant insulating material which is inserted between the conductive portions of the conductor forming the coil and covers a

substantial portion of the coil, wherein the heat resistant insulating material contact the conductive portions of the coil. As a result of this combination of features, Applicant's invention allows for achieving a heat resisting temperature of the coil unit that is higher than that of the coil unit whose conductor has an insulation tube.

Nagahira is directed to an image heating apparatus which uses an excitation coil for generating a magnetic field to induce an eddy current in the heating member, the heating member having a magnetic metallic layer and a non-magnetic metallic layer, and the coil being disposed on the magnetic metallic layer side of the heating member. In Nagahira the conductors of the induction coil 2 are covered with an insulation tube. This is because the conductors are located side-by-side contact with each other. Therefore, Nagahira does not teach or suggest a coil formed of a conductor whose conductive portions not covered with an insulating tube are removed and a heat resistant insulating material which is inserted between the conductive portions of the conductor forming the coil and covers a substantial portion of the coil, wherein the heat resistant insulating material contacts the conductive portions of the coil. Since neither claims 1 nor 10 are taught nor suggested by Nagahira, it is respectfully submitted that those claims are patentable over that reference.

Claims 2-7 and 11-16 depend from claims 1 and 10, respectively, and are therefore patentable over the art of record for reasons noted above with respect to claims 1 and 10. In addition, each recite features of the invention still further distinguishing it from the applied art. Favorable and independent consideration thereof is respectfully sought.

Applicant respectfully submits that all outstanding matters in the above application have been addressed and that this application is in condition for allowance.

Favorable reconsideration and early passage to issue of the above application are respectfully sought.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,



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